

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

**FELONY**

**INDICTMENT FOR CONSPIRACY TO COMMIT MAIL FRAUD  
AND PROGRAM FRAUD, AGGRAVATED IDENTITY THEFT,  
PROGRAM FRAUD, MAIL FRAUD, FALSE STATEMENTS, TAX EVASION,  
CONSPIRACY TO COMMIT MONEY LAUNDERING AND ASSET FORFEITURE**

UNITED STATES OF AMERICA	*	CRIMINAL NO.
VERSUS	*	SECTION:
BETTY JEFFERSON	*	VIOLATION: 18 U.S.C. § 371
ANGELA COLEMAN	*	18 U.S.C. § 1341
MOSE JEFFERSON	*	18 U.S.C. § 1028A
	*	18 U.S.C. § 666
	*	26 U.S.C. § 7201
	*	18 U.S.C. § 1956(h)
	*	18 U.S.C. § 1001
	*	18 U.S.C. § 982
	*	18 U.S.C. § 2
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The Grand Jury charges that:

**Count 1**  
**(Conspiracy)**

**A. AT ALL TIMES MATERIAL TO THIS INDICTMENT**

1. Beginning in approximately the 1980's, the Louisiana State Legislature (state) disbursed state funds to recipients in the form of grants for charitable and educational purposes ("Grants").

A Grant recipient was a non-profit corporation that qualified under United States Internal

Revenue Service (IRS) rules as tax exempt because it engaged in activities that furthered charitable, educational, religious, or scientific purposes. IRS rules absolutely prohibited a board member, officer or employee of a non-profit to receive a personal benefit from the non-profit, except for identified and authorized expenses and salaries.

2. A Grant recipient signed an agreement ("Agreement") stating that the grant funds would be used for the sole purpose outlined in the Agreement. The state required the Grant recipient to provide quarterly and year end reports reflecting exactly how the Grant funds had been spent.

3. State Grants were paid out of the state general funds following the state fiscal year beginning July 1st and ending June 30th of the next year. Grants were sponsored by individual members of the Louisiana State Legislature.

4. The United States Congress through the United States Department of Education provided Grants to non-profits for educational purposes. Federal grants were sponsored by a member of Congress and contained similar requirements and restrictions as state Grants.

5. The United States Department of Housing and Urban Development (HUD) provided housing assistance and federal grants to non-profits for improvements of multi-family dwellings for the elderly.

6. Beginning in the early 1990's and continuing to the present, Care Unlimited, Inc. ("Care Unlimited" or "CU"), Orleans Metropolitan Housing & Community Development, Inc. ("Orleans Metro") and Central City Adult Education Agency, Inc. ("Central City") (sometimes collectively referred to as the "non-profits") were non-profit organizations controlled and operated by one or more of the defendants **BETTY JEFFERSON, ANGELA COLEMAN, MOSE JEFFERSON** and Family Member 1, as more fully described herein.

7. At the times relevant to this indictment, the defendant **BETTY JEFFERSON** was the president of the board of directors of Greater St. Stephen Manor, Inc. (Greater St. Stephen Manor), a non-profit corporation organized under the laws of the State of Louisiana. Greater St. Stephen Manor owned and operated an elderly apartment complex of forty-one units (the Project) located in New Orleans, Louisiana which operated under Section 202.

8. From 2004, HUD provided approximately \$4 million to be used for capital improvements to the Project. Additionally, HUD provided housing assistance to Greater St. Stephen Manor. For example, in 2005, HUD paid Greater St. Stephen Manor \$87,199 in housing assistance payments.

9. During the times material to this conspiracy, the defendant **BETTY JEFFERSON** had signatory authority on several bank accounts in the name of Greater St. Stephen Manor.

10. Defendant **ANGELA COLEMAN** was the daughter of defendant **BETTY JEFFERSON**. The defendant **ANGELA COLEMAN** also used the name "Angela Howard."

11. The defendant **BETTY JEFFERSON** was the duly elected Tax Assessor for the 4<sup>th</sup> Municipal District, Orleans Parish, New Orleans, Louisiana, and has been since May 1998.

12. Defendant **BETTY JEFFERSON** controlled the non-profits Care Unlimited and Central City.

13. The defendant **BETTY JEFFERSON** controlled and operated the companies Jefferson Consultants, Inc., Jefferson Consultants, LLC (collectively referred to as Jefferson Consultants) Jeffco Services, Inc. and Jeffco Services, LLC (collectively referred to as Jeffco), and Maximal Home Mortgage, LLC (Maximal Mortgage). All were for profit Louisiana companies that were

used by the defendant **BETTY JEFFERSON** to transfer money from the non-profits to the defendants and others, as hereafter described.

14. For over the past two decades, defendant **BETTY JEFFERSON** was involved with receiving grant monies for non-profit companies she controlled.

15. The defendant **BETTY JEFFERSON** purchased 1723-25 Valmont Street, New Orleans, Louisiana, on or about October 24, 1995. On or about November 12, 2001, defendant **BETTY JEFFERSON** sold 1723-1725 Valmont Street to Jeffco.

16. On or about December 26, 2002, the defendant **BETTY JEFFERSON**, through Jeffco, sold 1723 Valmont Street to the defendant **ANGELA COLEMAN** and Family Member 9. She retained ownership of 1725 Valmont Street through Jeffco.

17. Defendant **ANGELA COLEMAN** was the president of the board of Care Unlimited.

18. Defendant **ANGELA COLEMAN** owned and operated defendant company A Plus Promotional Printing, LLC (A Plus), a for-profit Louisiana company that was used to transfer money from the non-profits to the defendants and others, as hereafter described.

19. Matco, Inc. and The Matco Group, LLC (collectively referred to as Matco) were for-profit Louisiana companies that were controlled by defendant **ANGELA COLEMAN** and were used to transfer money from the non-profits to the individual defendants and others, as hereafter described.

20. Defendant **MOSE JEFFERSON**, as chairman of the board of Orleans Metro, caused Grant applications to be submitted and Agreements to be signed with the state.

21. On or about October 13, 2000, the defendant **MOSE JEFFERSON** opened a bank account at Liberty Bank (Orleans Metro LB963) in the name of Orleans Metropolitan Housing, and listed only himself and Individual N as having signatory authority.
22. Defendant **MOSE JEFFERSON** controlled the companies Southwind Consultants, Inc., and Southwind Consultants, LLC (collectively referred to as Southwind), Enterprise Consultants, Inc. and Enterprise Consultants, LLC (collectively referred to as Enterprise Consultants) and B.E.P. Consulting Services, LLC (B.E.P.). All were for-profit Louisiana companies that received money and benefits from the defendants' controlled non-profits, as hereafter described.
23. Defendant **MOSE JEFFERSON** and the above for-profit companies, at various times during the conspiracy, operated and received rental payments from an apartment complex located at 2712-2716 Loyola Avenue, New Orleans, Louisiana, also known as "Mose Manor."
24. On or about June 12, 2002, Southwind purchased a building complex at 3313 South Saratoga Street, New Orleans, Louisiana, which defendant **MOSE JEFFERSON** used to obtain rental payments from several non-profits. Southwind purchased 3313 South Saratoga Street property from the non-profit Orleans Metro.
25. Enterprise Consultants and B.E.P. operated out of 3313 S. Saratoga and Mose Manor.
26. Family Member 1, at various times during the course of the conspiracy, was the purported executive director of several of the defendants' controlled non-profits.
27. Defendant **BETTY JEFFERSON** had the following credit card accounts in her name:
- a. Discover Credit Card, account ending #3721 (DiscoverCC3721);
  - b. First USA/JP Morgan Chase, account ending #0168 (FirstCC0168);
  - c. First National Bank of Omaha/Hibernia Visa, account ending #0088 (HBCC0088);

- d. Advanta Credit Card, account ending #0006 (AdvantaCC0006);
- e. Chase / Bank One Credit Card, account ending #7749 (ChaseCC7749);
- f. Citi Bank Credit Card, account ending #7485 (CitiCC7485);
- g. Bank of America, account ending #3356 (BoACC3356);
- h. MBNA Credit Card, account ending #4358 (MBNACC4358); and
- i. MBNA Credit Card, account ending #3356 (MBNACC3356).

28. Defendant **ANGELA COLEMAN** had a credit card with American Express in the name of "Angela Coleman/Coleman Certified Shorthand" for three approved card users: **BETTY JEFFERSON, ANGELA COLEMAN** and Family Member 9. The payments for the three American Express cards were reflected on account ending #3002 (AmExCC3002).

29. Defendant **ANGELA COLEMAN** financed the purchase of 1723 Valmont Street, as described above, through Standard Mortgage Corporation (Standard Mgt Loan #117513) and beginning in or around January 2003, owed a monthly mortgage note of approximately \$1,344.25.

30. Defendant **BETTY JEFFERSON** financed the purchase of 1725 Valmont Street, as described above, through Chase Manhattan Mortgage Corporation (Chase Mgt Loan #6219) and beginning in or around July 2003, owed a monthly mortgage note of approximately \$965.24.

## **B. THE CONSPIRACY**

1. Beginning at a time unknown but prior to January 1, 1998 and continuing to the present, in the Eastern District of Louisiana and elsewhere, the defendants **BETTY JEFFERSON, ANGELA COLEMAN** and **MOSE JEFFERSON**, did knowingly and willfully conspire,

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confederate and agree with each other and with other persons known and unknown to the Grand Jury to:

- i) intentionally misapply and knowingly embezzle, steal, obtain by fraud and otherwise without authority convert to their own personal use, property valued at \$5,000 or more and owned by or under the care, custody and control of agencies which received federal funds in excess of \$10,000 in a year, in violation of Title 18 U.S.C. §666; and
- ii) knowingly and willfully use the mails for the purpose of executing the scheme set forth below, in violation of Title 18 U.S.C. §1341.

**C. THE SCHEME**

1. Beginning at a time unknown but prior to January 1, 1998 and continuing to the present, in the Eastern District of Louisiana and elsewhere, **BETTY JEFFERSON, ANGELA COLEMAN** and **MOSE JEFFERSON**, did knowingly and willfully devise and intend to devise a scheme and artifice:

- a. to defraud the United States Department of Education, the United States Department of Housing and Urban Development, and the State of Louisiana; and
- b. to obtain money and property by means of false pretenses, promises and representations.

2. As part of the scheme, the defendants did defraud the United States Department of Education, the United States Department of Housing and Urban Development and the State of Louisiana out of funds which the state and federal agencies had provided to defendants' controlled non-profits for charitable and educational purposes.

3. As a further part of the scheme, the defendants:

- a. organized, incorporated and controlled tax exempt companies which were eligible to receive Grants;
- b. wrote and submitted Grant proposals and reports to the state and federal agencies for charitable, educational and public purposes, when in truth and fact the defendants diverted some of the funds to their personal benefit;
- c. opened checking accounts in the non-profit names listing themselves, or individuals under their control, as signatories on the non-profit bank accounts in order to maintain control of the funds;
- d. submitted monthly and yearly expenditure reports to the state and federal agencies which reports falsely and fraudulently represented that the Grant funds had been spent according to the Grant requirements, when in truth and fact as the defendants well knew they had falsely and fraudulently obtained these funds for their personal benefit;
- e. submitted false and fraudulent reports representing that a certain number of individuals had been assisted with Grant funds, when in truth and fact as the defendants knew the "program director" purportedly submitting said reports had never worked for the non-profits;
- f. wrote checks from non-profit bank accounts to defendants' companies to create the appearance to an outside auditor that the checks had been written to pay for legitimate business expenses, when in truth and fact the defendants' companies receiving the funds provided no services to the non-profits and were used as a

means to funnel money to the individual defendants and others for their personal use;

- g. hired an outside accountant to write non-profit checks in order to give the appearance the non-profit funds were being properly used and accounted for, when in truth and fact as the defendants well knew the accountant signed the checks prepared from a list provided to him by the defendants and the accountant had no day to day knowledge of the non-profits' operations;
- h. made it appear on budget summaries that Grant funds were being paid to employees who worked for the non-profits, when in truth and fact, the defendants knew these "employees" (hereinafter referred to as "straw payees") did not work for the non-profits, never received the checks or money, and were not aware that a payment had been issued to them. The defendants forged the straw payees' signatures and deposited the checks into their own bank accounts, the defendants' companies' bank accounts, or mailed the checks directly to a credit card company, for example American Express or Discover Card, for payment of the defendants' personal credit card charges;
- i. issued themselves W-2s or Form 1099s which reflected only a limited amount of funds paid to them in their individual names by the non-profits, when in truth and fact, the defendants knew the W-2s and Form 1099s did not state the true amount of compensation and benefits they received through the scheme;
- j. obtained Grant funds from the state of at least \$55,000 for fiscal year 1999 to 2000, promising that the funds would be used to tutor both adults and high school

drop outs so that they could pass the state's graduate equivalency test. Instead of using the funds as represented, the defendants converted approximately \$39,998 in grant funds to themselves, their companies and family members, by:

- causing to be written checks from the Grant funds to straw payees totaling approximately \$10,565, the ultimate beneficiary of the checks being defendant **BETTY JEFFERSON**;
- causing to be written checks from the Grant funds totaling approximately \$2,750 to Southwind;
- causing to be written a check in the amount of \$475.64 from Grant funds to pay the insurance premium on "Mose Manor," defendant **MOSE JEFFERSON**'s building;
- causing to be written checks from the Grant funds totaling approximately \$13,333 to the defendant **BETTY JEFFERSON**;
- causing to be written checks from the Grant funds totaling approximately \$5,912 to the defendant **ANGELA COLEMAN**, in her name or in the name of her alias, Angela Howard; and
- causing to be written checks from the Grant funds totaling \$2,016 to Family Member 1.

**D. OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY**

On or about the dates below, in furtherance of the conspiracy and to effect the unlawful objects thereof, and in a manner and fashion consistent with their receipt and misuse of state Grant funds previously described above, the defendants **BETTY JEFFERSON**, **ANGELA COLEMAN** and **MOSE JEFFERSON**, and others known and unknown to the Grand Jury, committed and caused to be committed the following Overt Acts, among others, in the Eastern District of Louisiana and elsewhere:

**CARE UNLIMITED, INC.**

**Federal Grant funds**

**Care Unlimited Bridge Program:**

1. Defendant **BETTY JEFFERSON** obtained control of Grant funds of approximately \$99,350 from the United States Department of Education for the Care Unlimited Bridge Program, for the Grant period beginning October 1, 2003 and ending September 30, 2004, by signing an agreement promising that the federal funds would be used to provide educational support services to pregnant teenagers, when in truth and fact she and the defendants converted approximately \$60,358 in Grant funds to their personal use, their companies and family members.
2. On or about October 7, 2003, the defendants **BETTY JEFFERSON** and **ANGELA COLEMAN** opened a bank account for the receipt of the \$99,350 at Bank One in the name of Care Unlimited Bridge Program (Bridge Program BO865) and listed only themselves as having signatory authority.

**Overt Acts 3 to 7:**

On or about the below listed dates and in the below listed amounts, and on other dates and amounts known and unknown to the grand jury, the defendants **BETTY JEFFERSON** and **ANGELA COLEMAN** funneled the federal funds to themselves by writing checks out of Bridge Program BO865 to the below listed straw payees:

<b>Overt Act</b>	<b>Amount</b>	<b>Check # Date</b>	<b>Payable to</b>	<b>Final Disposition or Deposited to</b>
<b>3</b>	<b>\$862.00</b>	<b>#1018 11/17/03</b>	<b>Individual A</b>	<b>BETTY JEFFERSON (MBNACC3356)</b>
<b>4</b>	<b>\$576.00</b>	<b>#1070 05/28/04</b>	<b>Individual B</b>	<b>BETTY JEFFERSON (FirstCC0168)</b>
<b>5</b>	<b>\$576.00</b>	<b>#1042 02/24/04</b>	<b>Individual B</b>	<b>ANGELA COLEMAN/ BETTY JEFFERSON (AmExCC3002)</b>

<b>Overt Act</b>	<b>Amount</b>	<b>Check # Date</b>	<b>Payable to</b>	<b>Final Disposition or Deposited to</b>
<b>6</b>	\$502.00	#1073 06/15/04	Individual A	<b>ANGELA COLEMAN/ BETTY JEFFERSON</b> (AmExCC3002)
<b>7</b>	\$665.00	#1081 09/01/04	Individual A	<b>ANGELA COLEMAN</b> (Savings Account HB6518)

**Overt Acts 8 to 30:**

On or about the below listed dates, and in the below listed amounts, and on other dates and amounts known and unknown to the grand jury, the defendants **BETTY JEFFERSON** and **ANGELA COLEMAN** wrote the below listed checks out of the federal Bridge Program BO865, to the below listed family members and deposited the checks to pay the personal expenses of defendants **BETTY JEFFERSON** and **ANGELA COLEMAN**, and their companies, as follows:

<b>Overt Act</b>	<b>Amount</b>	<b>Check # Date</b>	<b>Payable to</b>	<b>Final Disposition or Deposited to</b>
<b>8</b>	\$1,327.43	#10000 11/10/03	Family Member 1	<b>ANGELA COLEMAN</b> (Savings Account HB6518)
<b>9</b>	\$360.00	#1009 11/05/03	Family Member 2	<b>ANGELA COLEMAN/ BETTY JEFFERSON</b> (AmExCC3002)
<b>10</b>	\$916.00	#1007 11/05/03	Family Member 1	<b>BETTY JEFFERSON</b> (Jeffco HB656)
<b>11</b>	\$360.00	#1009 11/05/03	Family Member 2	<b>ANGELA COLEMAN/ BETTY JEFFERSON</b> (AmExCC3002)

<b>Overt Act</b>	<b>Amount</b>	<b>Check # Date</b>	<b>Payable to</b>	<b>Final Disposition or Deposited to</b>
<b>12</b>	\$260.00	#1028 12/21/03	Family Member 1	<b>ANGELA COLEMAN</b> (Matco HB234)
<b>13</b>	\$548.00	#1024 12/21/03	Family Member 2	<b>BETTY JEFFERSON</b> (Jeffco HB656)
<b>14</b>	\$576.00	#1020 12/07/03	Family Member 2	<b>ANGELA COLEMAN</b> (Savings Account HB6518)
<b>15</b>	\$300.00	#1037 01/30/04	Family Member 1	<b>ANGELA COLEMAN</b> (A Plus HB967)
<b>16</b>	\$465.44	#10028 02/20/04	Family Member 1	<b>ANGELA COLEMAN</b> (A Plus HB967)
<b>17</b>	\$400.00	#1064 04/30/04	Family Member 2	<b>ANGELA COLEMAN/ BETTY JEFFERSON</b> (AmExCC3002)
<b>18</b>	\$916.67	#1038 06/15/04	Family Member 1	<b>ANGELA COLEMAN</b> (A Plus HB967)
<b>19</b>	\$916.00	#1067 07/01/04	Family Member 1	<b>BETTY JEFFERSON</b> (Jefferson Consultants HB6942)
<b>20</b>	\$1,700.00	#1083 07/30/04	Family Member 1	<b>BETTY JEFFERSON</b> (Jefferson Consultants HB6942)
<b>21</b>	\$350.00	#1085 08/15/04	Family Member 2	<b>ANGELA COLEMAN/ BETTY JEFFERSON</b> (AmExCC3002)
<b>22</b>	\$1,654.28	#10034 03/30/04	Family Member 1	<b>BETTY JEFFERSON</b> (A Plus HB967)

<b>Overt Act</b>	<b>Amount</b>	<b>Check # Date</b>	<b>Payable to</b>	<b>Final Disposition or Deposited to</b>
<b>23</b>	\$1,654.28	#10040 04/28/04	Family Member 1	<b>ANGELA COLEMAN</b> (A Plus HB967)
<b>24</b>	\$850.00	#1086 08/15/04	Family Member 1	<b>BETTY JEFFERSON</b> (Chase Mgt Loan #6219)
<b>25</b>	\$850.00	#1080 09/01/04	Family Member 1	<b>BETTY JEFFERSON</b> (Jefferson Consultants HB6942)
<b>26</b>	\$802.00	#1087 09/30/04	Family Member 2	<b>ANGELA COLEMAN</b> (Checking Account HB606)
<b>27</b>	\$850.00	#1088 10/01/04	Family Member 1	<b>BETTY JEFFERSON</b> (Jeffco HB656)
<b>28</b>	\$850.00	#1092 10/15/04	Family Member 1	<b>BETTY JEFFERSON</b> (Jefferson Consultants HB6942)
<b>29</b>	\$850.00	#1093 11/30/04	Family Member 1	<b>BETTY JEFFERSON</b> (Jefferson Consultants HB6942)
<b>30</b>	\$850.00	#1091 10/14/04	Family Member 1	<b>BETTY JEFFERSON</b> (Jeffco HB656)

**Overt Acts 31 to 35:**

From on or about November 5, 2003 to on or about December 31, 2004, the defendants **BETTY JEFFERSON** and **ANGELA COLEMAN** wrote checks out of the federal Bridge Program BO865 to the below listed defendants' companies:

- 31.** Approximately \$5,100 to Jeffco, in addition to the above concealed payments;
- 32.** Approximately \$8,650 to Jefferson Consultants, in addition to the above concealed payments;
- 33.** Approximately \$1,119 to A Plus, in addition to the above concealed payments;

34. Approximately \$8,799 to Matco; and
35. Approximately \$2,500 to Southwind.

State Grant funds

The defendants **BETTY JEFFERSON, ANGELA COLEMAN, MOSE JEFFERSON** and Family Member 1 obtained control of approximately \$791,468 in state Grant funds from approximately late 1999 through 2006, by falsely stating, and causing to be stated, that said Grant funds would be used solely for the Grant purposes, when in truth and fact they knew that after depositing the funds into the bank accounts under their control the defendants would convert to their benefit an amount of the funds, ultimately totaling approximately \$627,378, through false and fraudulent means, examples of which are as follows:

Care Unlimited Bridge Program:

36. Defendants **BETTY JEFFERSON, ANGELA COLEMAN** and Family Member 1 obtained control of Grant funds of approximately \$100,000 from the State of Louisiana for the Care Unlimited Bridge Program, for fiscal year July 1, 2004 through June 30, 2005, which they deposited into Bridge Program BO865, by signing an agreement promising that the state funds would be used exclusively to provide educational support services to pregnant teenagers, when in truth and fact the defendants **BETTY JEFFERSON** and **ANGELA COLEMAN** converted approximately \$71,447 in Grant funds to their personal use, their companies and family members.
37. In the agreement described in Overt Act 36, the defendants **BETTY JEFFERSON, ANGELA COLEMAN** and Family Member 1 represented that Individual C would be the program coordinator and confirmed such in follow up documents to the state, when in truth and in fact, the defendants well knew that Individual C was not involved in the program, was not a teacher; and did in fact receive no funds from the Grant.
38. On or about May 18, 2005, the defendants **BETTY JEFFERSON, ANGELA COLEMAN** and Family Member 1 received from the state by Federal Express a check in the amount of \$25,000 dated March 13, 2005, representing the issuance of the third quarter funding for fiscal year 2004-2005 for the Care Unlimited Bridge Program.

**Overt Acts 39 to 53:**

On or about the below listed dates, in the below listed amounts, and on other dates and amounts known and unknown to the grand jury, the defendants **BETTY JEFFERSON** and **ANGELA COLEMAN** funneled the state funds to themselves by writing checks out of Bridge Program BO865 to the below listed straw payees:

<b>Overt Act</b>	<b>Amount</b>	<b>Check # Date</b>	<b>Payable to</b>	<b>Final Disposition or Deposited to</b>
<b>39</b>	\$2,000.00	#1141 06/07/05 (Converted to cashiers check)	Individual D	<b>ANGELA COLEMAN</b> (Checking account CO211)
<b>40</b>	\$882.00	#999996 06/07/05 (Converted to cashiers check)	Individual B	<b>ANGELA COLEMAN</b> (Matco HB234)
<b>41</b>	\$954.00	#1144 05/30/05 (Converted to cashiers check)	Individual A	<b>ANGELA COLEMAN/ BETTY JEFFERSON</b> (AmExCC3002)
<b>42</b>	\$827	#1130 03/25/05	Individual A	<b>BETTY JEFFERSON</b> (DiscoverCC3721)
<b>43</b>	\$540.43	#1150 07/15/05	Individual A	<b>BETTY JEFFERSON</b> (Jeffco HB656)
<b>44</b>	\$619	#1135 06/15/05	Individual E	<b>BETTY JEFFERSON</b> (BoACC3356)
<b>45</b>	\$900	#1107 03/15/05	Individual F	<b>BETTY JEFFERSON</b> (Jefferson Consultants HB6942)
<b>46</b>	\$1065	#1131 03/25/05	Individual F	<b>BETTY JEFFERSON</b> (Jeffco HB656)

<b>Overt Act</b>	<b>Amount</b>	<b>Check # Date</b>	<b>Payable to</b>	<b>Final Disposition or Deposited to</b>
<b>47</b>	\$708.53	#1159 06/20/05	Individual F	<b>ANGELA COLEMAN</b> (Checking Account HB606)
<b>48</b>	\$855	#1108 02/15/05	Individual B	<b>BETTY JEFFERSON</b> (ChaseCC7749)
<b>49</b>	\$1,107.75	#1134 04/15/05	Individual B	<b>ANGELA COLEMAN</b> (A Plus BO343)
<b>50</b>	\$818	#1123 03/25/05	Individual B	<b>ANGELA COLEMAN</b> (Checking Account HB606)
<b>51</b>	\$818.26	#1153 06/20/05	Individual B	<b>ANGELA COLEMAN</b> (Checking Account HB606)
<b>52</b>	\$630	#1145 06/15/05 (Converted to cashiers check)	Individual C	<b>BETTY JEFFERSON</b> (ChaseCC7749)
<b>53</b>	\$906	#1156 06/20/05	Individual G	<b>BETTY JEFFERSON</b> (Jeffco HB656)

**Overt Acts 54 to 59:**

From on or about February 3, 2005 to on or about June 30, 2005, the defendants **BETTY JEFFERSON** and **ANGELA COLEMAN** wrote checks out of Bridge Program BO865 to the below listed defendants' companies, as follows:

- 54. Approximately \$9,800 to Jeffco, in addition to the above concealed payments;
- 55. Approximately \$6,800 to Maximal Mortgage, which the defendant **BETTY JEFFERSON** then transferred \$3,000 to Jefferson Consultants and checks totaling approximately \$1,965 to herself; and
- 56. Approximately \$1,858 to Matco.
- 57. From on or about February 3, 2005 to on or about June 30, 2005, the defendants **BETTY JEFFERSON** and **ANGELA COLEMAN** wrote checks out of Bridge Program BO865 totaling approximately \$14,902 to Family Member 1.
- 58. From on or about February 3, 2005 to on or about June 30, 2005, defendants **BETTY JEFFERSON** and **ANGELA COLEMAN** wrote checks out of Bridge Program BO865 totaling approximately \$7,683 to Family Member 1 however, **BETTY JEFFERSON** and **ANGELA COLEMAN** deposited the checks into bank accounts under their control to pay their personal expenses.
- 59. On or about February 28, 2005, the defendants submitted a report to the State purportedly certified by Individual C that Individual C had provided certified teachers for 6-8 weeks to twenty-five pregnant teenage clients, when in truth and fact the defendants well knew that Individual C did not certify the February 28, 2005 submission and did not work for the Care Unlimited Bridge Program.

**Care Unlimited Project Chance:**

- 60. On or about August 17, 2006, defendants **BETTY JEFFERSON**, **ANGELA COLEMAN**, **MOSE JEFFERSON** and Family Member 1 obtained control of Grant funds of \$36,213.55 from the state based upon a written request on February 13, 2006, by Family Member 3 stating that services had been performed by employees of three Care Unlimited programs: Making Great Strides, Community Empowerment and Redevelopment Program and The Bridge Program, from July 1, 2005 through August 31, 2005, however due to Hurricane Katrina they had not received any funds.
- 61. The state mailed a payment of \$36,213.55, as requested by Family Member 3, to the non-profits' accountant's address on Poydras Street, New Orleans. The defendants caused the funds to be deposited into Liberty Bank account ending in 361 (Project Chance LB361).
- 62. On or about August 18, 2006, Family Member 1 sent a list of names to the accountant with an accompanying dollar amount beside each individual's name for the accountant to write checks to these individuals out of the \$36,213.55. However, instead of using the funds as represented to the state and the accountant, the defendants **BETTY JEFFERSON**, **ANGELA COLEMAN** and **MOSE JEFFERSON** converted

approximately \$15,279 in Grant funds to their personal use, their companies and family members.

**Overt Acts 63 to 68:**

On or about August 18, 2006, the defendants **BETTY JEFFERSON, ANGELA COLEMAN** and **MOSE JEFFERSON** caused to be written out of Project Chance LB361 checks totaling approximately \$32,205, some of which are described below:

- 63. Approximately \$6,414 to Family Member 1;
- 64. Approximately \$2,600 to B.E.P.;
- 65. Approximately \$3,724 issued to Individual R, which checks were deposited into A-Plus;
- 66. Approximately \$1,050 to Jeffco;
- 67. Approximately \$872 to Family Member 2, which was deposited into A Plus; and
- 68. Approximately \$184 to Angela Howard, a/k/a defendant **ANGELA COLEMAN**, which was deposited into A Plus.

**Care Unlimited Project Chance:**

- 69. Defendants **BETTY JEFFERSON, ANGELA COLEMAN** and Family Member 1 obtained control of Grant funds of approximately \$178,000 from the state for the Care Unlimited Project Chance program, for fiscal year July 1, 2001 through June 30, 2002, by submitting a Grant application promising that the state funds would be used exclusively to train, counsel and focus on the broad problems of black males, between the ages of 9 through 21, when in truth and fact the defendants **BETTY JEFFERSON, ANGELA COLEMAN** and **MOSE JEFFERSON** converted approximately \$176,029 in Grant funds to their personal use, their companies and family members.
- 70. On or about September 26, 2001, defendants **BETTY JEFFERSON** and **ANGELA COLEMAN** opened a bank account for receipt of the \$178,000 Grant at Regions Bank in the name of Care Unlimited, Inc. ( Project Chance RB061), and set themselves up as the only individuals with the authority to write and sign checks out of that account.

**Overt Acts 71 to 76:**

In the Grant application to the state for the Care Unlimited Project Chance program, defendants represented that certain individuals would be hired to be a full time executive

director, a trainer, counselors, coordinator, and a private contractor, when in truth and fact the defendants well knew that:

71. Individual N, listed as the full time executive director receiving a salary of \$32,000, did not receive any money, benefits or salary as represented in the Grant application;
72. Individual O, listed as a full time trainer receiving a salary of \$20,000, worked exclusively full time as **MOSE JEFFERSON**'s handyman and carpenter, did not function as a trainer for Project Chance, and in fact performed no work whatsoever for this Grant program;
73. Individual H, listed as a full time counselor receiving a salary of \$18,000, worked exclusively full time at the Tax Assessor's Office for the defendant **BETTY JEFFERSON** and did not work for Project Chance, and in fact never received any of the funds as listed in the Grant application;
74. Family Member 6, listed as the full time coordinator receiving a salary of \$27,000, and did not receive a salary of \$27,000 as listed in the Grant application;
75. Family Member 3, listed as a private contractor, was living approximately half of the Grant period in Austria as a student, did not work as a private contractor, and did not receive the \$6,000 as listed in the Grant application; and
76. Individual Q, listed as a full time counselor receiving a salary of \$20,200, did not receive any money, benefits or salary from the Grant program.

**Overt Acts 77 to 99:**

On or about the below listed dates, in the below listed amounts, and on other dates and amounts known and unknown to the grand jury, the defendants **BETTY JEFFERSON**, **ANGELA COLEMAN** and **MOSE JEFFERSON** funneled the state funds to themselves or their companies by writing checks out of Project Chance RB061 to the below listed straw payees:

Overt Act	Amount	Check # Date	Payable to	Final Disposition or Deposited to
77	\$1,999.98	(no #) 09/27/01	Family Member 3	<b>ANGELA COLEMAN</b> (Checking Account CO901)

<b>Overt Act</b>	<b>Amount</b>	<b>Check # Date</b>	<b>Payable to</b>	<b>Final Disposition or Deposited to</b>
<b>78</b>	\$2,200	(no #) 09/28/01	Individual H	<b>BETTY JEFFERSON</b> (Jeffco HB656)
<b>79</b>	\$2,000	#1016 10/31/01	Family Member 4	<b>BETTY JEFFERSON</b> (FirstUSACC0168)
<b>80</b>	\$340	#1019 11/15/01	Family Member 5	<b>ANGELA COLEMAN</b> (Checking Account CO901)
<b>81</b>	\$2,916	#1023 11/15/01	Family Member 3	<b>ANGELA COLEMAN</b> (Checking Account CO901)
<b>82</b>	\$1,100	#1006 10/12/01	Individual H	<b>BETTY JEFFERSON</b> (DiscoverCC3721)
<b>83</b>	\$2,000	#1020 11/14/01	Family Member 4	<b>BETTY JEFFERSON</b> (Jeffco HB656)
<b>84</b>	\$500	#1026 11/15/01	Family Member 6	<b>BETTY JEFFERSON</b> (AdvantaCC0006)
<b>85</b>	\$704	#1022 12/03/01	Family Member 2	<b>BETTY JEFFERSON</b> (FirstUSACC0168)
<b>86</b>	\$1,333	#1059 12/20/01	Family Member 3	<b>ANGELA COLEMAN</b> (Checking Account CO901)
<b>87</b>	\$1,250	#1057 12/20/01	Individual H	<b>BETTY JEFFERSON</b> (MBNA4358)
<b>88</b>	\$1,600	#1061 01/15/02	Individual H	<b>BETTY JEFFERSON</b> (DiscoverCC3721)
<b>89</b>	\$816.67	#1072 01/26/02	Individual H	<b>ANGELA COLEMAN</b> (Checking Account CO901)
<b>90</b>	\$1,000	#1071 01/30/02	Individual J	<b>ANGELA COLEMAN</b> (Savings Account HB6518)

<b>Overt Act</b>	<b>Amount</b>	<b>Check # Date</b>	<b>Payable to</b>	<b>Final Disposition or Deposited to</b>
<b>91</b>	\$816.67	#1118 03/25/02	Individual H	<b>BETTY JEFFERSON</b> (MBNA4358)
<b>92</b>	\$800	#1136 04/15/02	Family Member 3	<b>ANGELA COLEMAN/ BETTY JEFFERSON</b> (AmExCC3002)
<b>93</b>	\$300	#1077 02/03/02	Family Member 7	<b>BETTY JEFFERSON</b> (HBCC0088)
<b>94</b>	\$1,000	#1052 05/03/02	Individual I	<b>BETTY JEFFERSON</b> (FirstUSACC0168)
<b>95</b>	\$1,000	#1144 05/15/02	Individual H	<b>BETTY JEFFERSON</b> (DiscoverCC3721)
<b>96</b>	\$2,000	#1327 06/28/02	Family Member 7	<b>BETTY JEFFERSON</b> (Jefferson Consultants HB6942)
<b>97</b>	\$2,066	#1177 06/28/02	Individual I	<b>MOSE JEFFERSON</b> (Enterprise Consultants LB726)
<b>98</b>	\$1,000	#1119 03/25/02	Individual I	<b>BETTY JEFFERSON</b> (FirstCC0168)
<b>99</b>	\$1,800	#1039 12/11/01	Individual J	<b>BETTY JEFFERSON</b> (Jeffco HB656)

**Overt Acts 100 to 109:**

Beginning in or around September 2001 and continuing through in or around June 2002, the defendants **BETTY JEFFERSON** and **ANGELA COLEMAN** wrote checks out of Project Chance RB061, to themselves, their companies, employees, personal remodeling contractors and family members, as follows:

- 100.** Approximately \$39,585 to defendant **MOSE JEFFERSON**;
- 101.** Approximately \$31,833 to Family Member 8;
- 102.** Approximately \$25,276 to Family Member 1;

- 103. Approximately \$10,418 to defendant **MOSE JEFFERSON**'s handyman, Individual O;
  - 104. Approximately \$8,608 to defendant **BETTY JEFFERSON**;
  - 105. Approximately \$7,950 to Southwind;
  - 106. Approximately \$2,400 to pay a worker who never heard of Care Unlimited to remodel defendant **BETTY JEFFERSON**'s personal residence on Jackson Avenue;
  - 107. Approximately \$4,150 to Individual J to remodel defendant **BETTY JEFFERSON**'s personal residence on Jackson Avenue;
  - 108. Approximately \$1,661 to Matco; and
  - 109. Approximately \$625 to Jeffco.
110. The defendant **MOSE JEFFERSON** took additional checks written out of Project Chance RB061, which were made payable to Individual O totaling approximately \$11,456, and deposited them into his personal checking account and Enterprise Consultants' checking account.

**Care Unlimited Project Chance:**

111. Defendants **BETTY JEFFERSON**, **ANGELA COLEMAN** and Family Member 1 obtained control of Grant funds of approximately \$200,000 from the state for the Care Unlimited Project Chance program, for the fiscal year 2001-2002, by submitting a Grant application representing that the state funds would be used exclusively for educational and charitable purposes, when in truth and fact the defendants **BETTY JEFFERSON**, **ANGELA COLEMAN** and **MOSE JEFFERSON** converted approximately \$143,941 in Grant funds to their personal use, their companies and family members.
112. On or about December 11, 2001, the defendants **BETTY JEFFERSON** and **ANGELA COLEMAN** opened a bank account for the receipt of the \$200,000 Grant at Hibernia in the name of Care Unlimited, Inc. (Care Unlimited HB161), and listed only themselves as having signatory authority.

**Overt Acts 113 to 131:**

On or about the below listed dates, in the below listed amounts, and on other dates and amounts known and unknown to the grand jury, the defendants **BETTY JEFFERSON**

and **ANGELA COLEMAN** funneled state funds to themselves and their companies by writing checks out of Care Unlimited HB161 to the below listed straw payees:

<b>Overt Act</b>	<b>Amount</b>	<b>Check # Date</b>	<b>Payable to</b>	<b>Final Disposition or Deposited to</b>
<b>113</b>	\$2,600	(not legible) 12/14/01	Family Member 3	<b>BETTY JEFFERSON</b> (Jefferson Consultants HB6942)
<b>114</b>	\$1,078	#1002 12/17/01	Individual K	<b>BETTY JEFFERSON</b> (CitiCC7485)
<b>115</b>	\$6,000	#1012 01/11/02 (Converted to Cashier Check)	Family Member 4	<b>BETTY JEFFERSON</b> (Jeffco HB656)
<b>116</b>	\$1,296	#1022 01/11/02	Individual F	<b>BETTY JEFFERSON</b> (AdvantaCC0006)
<b>117</b>	\$2,500	#1025 01/11/02	Family Member 3	<b>BETTY JEFFERSON</b> (CitiCC7485)
<b>118</b>	\$7,500	#1013 01/11/02	Family Member 3	<b>BETTY JEFFERSON</b> (FirstCC0168)
<b>119</b>	\$1,944	#1026 12/30/01	Family Member 3	<b>BETTY JEFFERSON</b> (DiscoverCC3721)
<b>120</b>	\$1,944	#1029 12/30/01	Individual K	<b>ANGELA COLEMAN</b> (Savings Account HB6518)
<b>121</b>	\$ 884	#1042 01/11/02	Individual L	<b>BETTY JEFFERSON</b> (CitiCC7485)

<b>Overt Act</b>	<b>Amount</b>	<b>Check # Date</b>	<b>Payable to</b>	<b>Final Disposition or Deposited to</b>
<b>122</b>	\$2,000	#1135 06/20/02	Family Member 4	<b>BETTY JEFFERSON</b> (Jeffco HB656)
<b>123</b>	\$ 760	#1052 02/28/02	Individual F	<b>BETTY JEFFERSON</b> (DiscoverCC3721)
<b>124</b>	\$1,025	#1053 02/28/02	Individual M	<b>BETTY JEFFERSON</b> (MBNACC4358)
<b>125</b>	\$ 635	#1074 03/15/02	Individual M	<b>BETTY JEFFERSON</b> (Jefferson Consultants HB6942)
<b>126</b>	\$2,500	#1060 03/20/02	Family Member 3	<b>BETTY JEFFERSON</b> (HBCC0088)
<b>127</b>	\$ 687	#1104 05/15/02	Individual M	<b>BETTY JEFFERSON</b> (CitiBankCC7485)
<b>128</b>	\$1,338	#1106 03/24/02	Family Member 2	<b>BETTY JEFFERSON</b> (MBNACC4358)
<b>129</b>	\$1,118	#1119 05/20/02	Family Member 2	<b>BETTY JEFFERSON</b> (HBCC0088)
<b>130</b>	\$ 960	#1062 06/09/02	Individual A	<b>BETTY JEFFERSON</b> (FirstCC0168)
<b>131</b>	\$5,000	#1131 06/24/02 (Converted to cashier check)	Family Member 3	<b>ANGELA COLEMAN</b> ( Savings Account HB6518)

### **Overt Acts 132 to 138:**

From on or about December 11, 2001 and continuing through on or about November 26, 2002, the defendants **BETTY JEFFERSON** and **ANGELA COLEMAN** wrote checks out of Care Unlimited HB161, to themselves, their companies and family members, as follows:

- 132. Approximately \$29,188 to defendant **BETTY JEFFERSON**;
- 133. Approximately \$19,598 to Family Member 1;
- 134. Approximately \$4,000 to Southwind;
- 135. Approximately \$3,434 to Family Member 4's company;
- 136. Approximately \$2,650 to Jeffco;
- 137. Approximately \$1,810 to Matco; and
- 138. Approximately \$1,467 to Maximal Mortgage.

### **Care Unlimited Project Chance Stadium Grant:**

- 139. Defendant **MOSE JEFFERSON** obtained control of Grant funds of approximately \$93,453.76 from the state through the LA Stadium & Exposition District New Orleans Area Legislative Economic Development Fund (LSED) for a Care Unlimited Project Chance program, from on or about the Grant check date of August 26, 2002, by submitting a Grant application promising that the state funds would be used exclusively to teach basic building and painting skills to at risk youth males.
- 140. On or about September 11, 2002, Family Member 1 and Individual O, defendant **MOSE JEFFERSON**'s handyman, opened a bank account for the receipt of the \$93,453.76 at Liberty Bank in the name of Care Unlimited, Inc. Project Chance (Project Chance LB507), which defendant **MOSE JEFFERSON** converted approximately \$67,038 in Grant funds to his personal use and Family Member 1.

### **Overt Acts 141 to 145:**

From on or about September 11, 2002 to on or about August 6, 2003, the defendant **MOSE JEFFERSON** funneled approximately \$67,038 of the state funds from Project Chance LB507 to his personal use, and to his family, and not for the purposes for which the funds were intended as follows:

141. the defendant **MOSE JEFFERSON** caused approximately \$27,300 of the Grant funds in Project Chance LB507 to be transferred to his personal Orleans Metro LB963, as described in Section A, to pay his handymen and to purchase supplies for his personal projects;
142. the defendant **MOSE JEFFERSON** used approximately \$23,438 of Grant funds in Project Chance LB507 to pay his handymen for work on the defendant **MOSE JEFFERSON**'s personal projects,
143. the defendant **MOSE JEFFERSON** caused checks to be written totaling approximately \$7,800 in Grant funds to Southwind;
144. the defendant **MOSE JEFFERSON** caused checks to be written totaling approximately \$6,300 in Grant funds to Individual N, which defendant **MOSE JEFFERSON** deposited into his Enterprise Consultants bank account;
145. the defendant **MOSE JEFFERSON** caused checks to be written out of Project Chance LB507 totaling approximately \$2,200 in Grant funds to Family Member 1.

#### **Care Unlimited Project Chance**

146. Defendants **BETTY JEFFERSON, ANGELA COLEMAN** and Family Member 1 obtained control of Grant funds of at least approximately \$103,801.50 from the state for the Care Unlimited Project Chance program for fiscal year July 1, 2000 through June 30, 2001, which funds were deposited into Care Unlimited, Inc. Bank One account ending 321 (Project Chance BO321), by submitting a Grant application promising that the state funds would be used exclusively for educational and charitable purposes, when in truth and fact the defendants **BETTY JEFFERSON, ANGELA COLEMAN** and **MOSE JEFFERSON** converted approximately \$88,644 in Grant funds to their personal use, their companies and family members.

#### **Overt Acts 147 to 150:**

From on or about January 20, 2001 to on or about June 30, 2001, the defendants **BETTY JEFFERSON, ANGELA COLEMAN** and **MOSE JEFFERSON** funneled the state funds from Project Chance BO321 to their personal use and their companies, and not for the purposes for which the funds were intended through the following means:

147. By writing or causing to be written checks from the Grant funds to straw payees and family members totaling approximately \$22,098;

148. By writing or causing to be written checks from the Grant funds totaling approximately \$13,541 which were used to pay the wages of **MOSE JEFFERSON**'s handyman, Individual O;
149. By writing or causing to be written checks from the Grant funds made payable to Individual Q totaling approximately \$5,416, which the defendant **MOSE JEFFERSON** deposited into his Southwind and Enterprise Consultants bank accounts; and
150. By writing checks from the Grant funds totaling approximately \$2,800 to Individual S for work done on defendant **BETTY JEFFERSON**'s personal residence on Jackson Avenue.

**ORLEANS METROPOLITAN HOUSING &  
COMMUNITY DEVELOPMENT, INC.**

**Overt Acts 151 to 153:**

151. Defendant **MOSE JEFFERSON** obtained control of approximately \$25,000 in Grant funds on or about November 4, 2004, from the state, which were deposited into Orleans Metro Bank One account ending 772 (Orleans Metro BO772). The Grant funds were to be used to purchase equipment in order to "enhance the quality of life by removing harborage for vermin and pests, beautify [the then and] ... now dismal eyesore" of run down, overgrown lots in the Central City area of New Orleans.
152. Less than two months later, on or about December 31, 2004, the defendant **MOSE JEFFERSON** transferred the \$25,000 in Grant funds out of Orleans Metro BO772 to his personal Orleans Metro account, Orleans Metro LB963, described above in Section A.
153. From on or about January 3, 2005 to on or about July 5, 2005, the defendant **MOSE JEFFERSON** paid his handymen for work on his personal projects with the siphoned off \$25,000 and did not use any of the Grant funds to purchase equipment to cut and clear overgrown lots in the Central City area, nor did his workers clear any overgrown lots.

**GREATER ST. STEPHEN MANOR, INC.**

**Overt Acts 154 to 158:**

In addition to the federal and state funds described above, the defendant **BETTY JEFFERSON** and Family Member 3 obtained control of HUD funds which were deposited into Greater St. Stephen Manor Dryades Savings Bank account ending 170

(Greater St. Stephen DSB170), and were used to improve the Property and provide housing assistance. The defendant **BETTY JEFFERSON** funneled approximately \$9,320 in federal funds to herself and defendant **ANGELA COLEMAN** by writing checks to straw payees from Greater St. Stephen DSB170, examples of which are set forth as follows:

<b>Overt Act</b>	<b>Amount</b>	<b>Check # Date</b>	<b>Payable to</b>	<b>Final Disposition or Deposited to</b>
<b>154</b>	\$455.50	#1210 04/20/04	Individual B	<b>ANGELA COLEMAN</b> (Savings Account HB6518)
<b>155</b>	\$2,528	#1203 04/02/04	Individual B	<b>ANGELA COLEMAN</b> (Savings Account HB6518)
<b>156</b>	\$465	#1103 05/29/03	Individual B	<b>ANGELA COLEMAN</b> (Checking Account HB606)
<b>157</b>	\$2,900	#1229 09/27/04 (Converted to cashiers check)	Family Member 3	<b>ANGELA COLEMAN</b> (Savings Account HB6518)
<b>158</b>	\$1,969	#1209 04/06/04	Family Member 7	<b>BETTY JEFFERSON</b> (HBCC0088)

All in violation of Title 18, United States Code, Section 371.

**Counts 2-11**  
**(Aggravated Identity Theft)**

- A.** The allegations contained in Sections A through D of Count 1 are realleged and incorporated as if fully set forth herein.
- B.** On or about the dates set forth below, in the Eastern District of Louisiana, the below listed defendants, did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, namely the name and signature of the below listed individuals,

during and in relation to offenses under Title 18, United States Code, Section 1341, namely mail fraud, as set forth in Counts 14-23, an offense enumerated under Title 18, United States Code, Section 1028A(c)(4):

<b>Count</b>	<b>Amount</b>	<b>Check # Date</b>	<b>Bank Account</b>	<b>Payable to</b>	<b>Final Disposition or Deposited to</b>
<b>2</b>	\$882	#999996 06/07/05 (Converted to cashiers check)	Bridge Program BO865	Individual B	Defendant <b>ANGELA COLEMAN</b> (Matco HB234)
<b>3</b>	\$576.00	#1070 05/28/04	Bridge Program BO865	Individual B	Defendant <b>BETTY JEFFERSON</b> (FirstCC0168)
<b>4</b>	\$576.00	#1042 02/24/04	Bridge Program BO865	Individual B	Defendants <b>ANGELA COLEMAN/ BETTY JEFFERSON</b> (AmExCC3002)
<b>5</b>	\$708.53	#1159 06/20/05	Bridge Program BO865	Individual F	Defendant <b>ANGELA COLEMAN</b> (Checking Account HB606)
<b>6</b>	\$630	#1145 06/15/05	Bridge Program BO865	Individual C	Defendant <b>BETTY JEFFERSON</b> (Converted into cashiers check deposited to ChaseCC7749)
<b>7</b>	\$906	#1156 06/20/05	Bridge Program BO865	Individual G	Defendant <b>BETTY JEFFERSON</b> (Jeffco HB656)

<b>Count</b>	<b>Amount</b>	<b>Check # Date</b>	<b>Bank Account</b>	<b>Payable to</b>	<b>Final Disposition or Deposited to</b>
<b>8</b>	\$827	#1130 03/25/05	Bridge Program BO865	Individual A	<b>BETTY JEFFERSON</b> (DiscoverCC3721)
<b>9</b>	\$954	#1144 05/30/05 (Converted to cashiers check)	Bridge Program BO865	Individual A	Defendants <b>ANGELA COLEMAN/ BETTY JEFFERSON</b> (AmExCC3002)
<b>10</b>	\$502.00	#1073 06/15/04	Bridge Program BO865	Individual A	Defendants <b>ANGELA COLEMAN/ BETTY JEFFERSON</b> (AmExCC3002)
<b>11</b>	\$665.00	#1081 09/01/04	Bridge Program BO865	Individual A	Defendant <b>ANGELA COLEMAN</b> (Savings Account HB#6518)

All in violation of Title 18, United States Code, Section 1028A.

**Count 12**

**(Embezzling money from an organization receiving federal funds)  
(Care Unlimited Bridge Program-GAP)**

- A.** The allegations contained in Sections A through D of Count 1 are realleged and incorporated as if fully set forth herein.
- B.** From on or about October 2003 to on or about January 2005, in the Eastern District of Louisiana, the defendants **BETTY JEFFERSON, ANGELA COLEMAN** and **MOSE JEFFERSON**, did intentionally misapply and knowingly embezzle, steal, obtain by fraud and otherwise without authority convert to their own personal use and the use of others, property

valued at \$5,000 or more, and owned by or under the care, custody and control of Care Unlimited, Inc. (Bridge Program), a non-profit corporation which received more than \$10,000 during a one year period from the United States government through the United States Department of Education.

All in violation of Title 18, United States Code, Section 666.

**Count 13**  
**(Embezzling money from an organization receiving federal funds)**  
**(Greater St. Stephen Manor, Inc. -- HUD)**

- A. The allegations contained in Sections A through D of Count 1 are realleged and incorporated as if fully set forth herein.
- B. From on or about January 1, 2003 to on or about September 2006, in the Eastern District of Louisiana, the defendants **BETTY JEFFERSON** and **ANGELA COLEMAN** did intentionally misapply and knowingly embezzle, steal, obtain by fraud and otherwise without authority convert to their own personal use and the use of other Jefferson family members, property valued at \$5,000 or more and owned by or under and the care, custody and control of Greater St. Stephen Manor, Inc., a non-profit which received more than \$10,000 in funds during a one year period from the United States government through the United States Department of Housing and Urban Development.

All in violation of Title 18, United States Code, Section 666.

**Counts 14-23**  
**(Mail Fraud)**

A. The allegations contained in Sections A through D of Count 1 are realleged and incorporated as if fully set forth herein.

**B. Mailings**

On or about the dates listed below, in the Eastern District of Louisiana, the defendants **BETTY JEFFERSON, ANGELA COLEMAN** and **MOSE JEFFERSON**, for the purpose of executing and attempting to execute the scheme and artifice to defraud set forth in Count 1, Part C, did knowingly cause to be placed in the United States Mail and interstate commercial carriers, the matters and things listed below:

Count	Date Mailed	Origin	Recipient	Description
14	March 23, 2005	Governor's Office of Urban Affairs & Development, P.O. Box 94004 Baton Rouge, LA 70804	Family Member 1 Care Unlimited Bridge Program, 4122 Eve Street, New Orleans, Louisiana 70125	\$50,000 check from State of Louisiana Department of Treasury -- 2nd Installment of Care Unlimited Bridge Program funding: 2004-2005
15	May 18, 2005	State of Louisiana, Governor's Office, 150 Third Street, Seventh floor, Baton Rouge, LA 70801	Family Member 1 Care Unlimited Bridge Program, 4122 Eve Street, New Orleans, Louisiana 70125	\$25,000 check from State of Louisiana Department of Treasury -- 3rd Installment of Care Unlimited Bridge Program funding: 2004-2005

Count	Date Mailed	Origin	Recipient	Description
16	November 4, 2004	State of Louisiana, Department of Treasury, P.O. Box 44154, Capitol Station, Baton Rouge, LA 70804-4154	Individual P, Executive Director, Orleans Metro, P.O. Box 56818, New Orleans, Louisiana 70156	\$75,000 check from State of Louisiana to Orleans Metro, \$25,000 for the purchase of equipment to clear overgrown lots in the Central City area of New Orleans
17	August 14, 2006	State of Louisiana, Department of Treasury, P.O. Box 44154, Capitol Station, Baton Rouge, LA 70804-4154	Care Unlimited, Inc., c/o Individual D, 650 Poydras Street, New Orleans, LA 70130	\$36,213.55 check from State of Louisiana, Department of Treasury for unsettled claims accrued in good faith from July 1, 2005 through June 30, 2006 Grant
18	September 6, 2004	Family Member 1 Care Unlimited Bridge Program, 4122 Eve Street, New Orleans, LA 70125	Governor's Office of Urban Affairs & Development, P.O. Box 94004 Baton Rouge, LA 70804	Grant application for Care Unlimited Bridge Program, fiscal year 2004-2005
19	August 15, 2004	Defendant <b>BETTY JEFFERSON</b> , Care Unlimited, 3313 S. Saratoga, Ste. 3, New Orleans, LA 70115	Chase Manhattan Mortgage Corporation, P.O. Box 830016, Baltimore, MD 21283-0016	Care Unlimited Check #1086 from federal Bridge Program BO865 payable to Family Member 1 for \$850 for payment on defendant <b>BETTY JEFFERSON's</b> mortgage note

Count	Date Mailed	Origin	Recipient	Description
20	February 24, 2004	Defendant <b>BETTY JEFFERSON</b> , 3313 S. Saratoga, Ste 3, New Orleans, LA 70115	American Express, P.O. Box 650448, Dallas, TX 75265-0448	Care Unlimited Check #1042 from federal Bridge Program BO865 payable to Individual B for \$576 for payment on defendants <b>ANGELA COLEMAN</b> and <b>BETTY JEFFERSON</b> credit card account
21	March 25, 2005	Defendant <b>BETTY JEFFERSON</b> , 3313 S. Saratoga, Ste 3, New Orleans, LA 70115	Discover Credit Card, P.O., Box 30395, Salt Lake City, UT 84130-0395	Care Unlimited Check #1130 from state Bridge Program BO865 payable to Individual A for \$827 for payment on defendant <b>BETTY JEFFERSON</b> credit card account
22	June 15, 2004	Defendant <b>ANGELA COLEMAN</b> , 3313 S. Saratoga, Ste 3, New Orleans, LA 70115	American Express, P.O. Box 360001, Ft. Lauderdale, FL 33336-0001	Care Unlimited Check #1073 from federal Bridge Program BO865 payable to Individual A for \$502 for payment on defendants <b>ANGELA COLEMAN</b> and <b>BETTY JEFFERSON</b> credit card account
23	May 28, 2004	Defendant <b>ANGELA COLEMAN</b> , 3313 S. Saratoga, Ste 3, New Orleans, LA 70115	Cardmember Service, P.O. 94014, Palatine, IL, 60094-4014	Care Unlimited Check #1070 from federal Bridge Program BO865 payable to Individual B for \$576 for payment on defendant <b>BETTY JEFFERSON</b> credit card account

All in violation of Title 18, United States Code, Sections 1341 and 2.

**Count 24**  
**(False Statements by MOSE JEFFERSON)**

A. The allegations contained in Sections A through D of Count 1 of this indictment are hereby realleged and incorporated herein as if fully set forth herein.

B. On or about July 24, 2006, in the Eastern District of Louisiana, in a matter within the jurisdiction of the Federal Bureau of Investigation, an agency of the United States, the defendant, **MOSE JEFFERSON**, knowingly and willfully made a false, fictitious, and fraudulent material statement and representation, in that the defendant, **MOSE JEFFERSON**, stated that he received no financial gain, no salary, and no property, from the defendant's controlled non-profit Orleans Metro, when in truth and in fact, the defendant well-knew that he received both financial gain and real property from Orleans Metro.

All in violation of Title 18, United States Code, Section 1001.

**Count 25**

A. The allegations contained in Sections A through D of Count 1 of this indictment are hereby realleged and incorporated herein as if fully set forth herein.

B. On or about July 24, 2006, in the Eastern District of Louisiana, in a matter within the jurisdiction of the Federal Bureau of Investigation, an agency of the United States, the defendant, **MOSE JEFFERSON**, knowingly and willfully made a false, fictitious, and fraudulent material statement and representation, in that the defendant, **MOSE JEFFERSON**, stated that he had never held any check signing authority for the defendant's controlled non-profit Orleans Metro,

when in truth and in fact, the defendant well-knew that he did, in fact, have check signing authority for a bank account associated with Orleans Metro.

All in violation of Title 18, United States Code, Section 1001.

**Count 26**

A. The allegations contained in Sections A through D of Count 1 of this indictment are hereby realleged and incorporated herein as if fully set forth herein.

B. On or about July 24, 2006, in the Eastern District of Louisiana, in a matter within the jurisdiction of the Federal Bureau of Investigation, an agency of the United States, the defendant, **MOSE JEFFERSON**, knowingly and willfully made a false, fictitious, and fraudulent material statement and representation, in that the defendant, **MOSE JEFFERSON**, stated that the only interaction he maintained with the defendant's controlled non-profit Orleans Metro was to sign yearly submissions to the Louisiana Legislative Auditors, when in truth and in fact, the defendant well-knew that he controlled a bank account, Orleans Metro LB963, associated with Orleans Metro.

All in violation of Title 18, United States Code, Section 1001.

**Count 27**  
**(Income Tax Evasion-Calendar Years 2001-2004)**

A. The allegations contained in Sections A through D of Count 1 are hereby realleged and incorporated herein as if fully set forth herein.

B. For the calendar year 2001, in the Eastern District of Louisiana, the defendant, **BETTY JEFFERSON**, a resident of New Orleans, Louisiana, did willfully attempt to evade and defeat a

large part of the income tax due and owing by her to the United States of America for the calendar year 2001, by concealing and attempting to conceal from the Internal Revenue Service the nature and extent of her income by intentionally not including on her personal tax return, the thousands of dollars she was obtaining from the United States Department of Education and the State of Louisiana through the non-profit Grants, wherein it was stated that her taxable income for the calendar year 2001 was the sum of \$51,119, and the amount of tax due and owing thereon was the sum of \$12,225, whereas, as she then and there well knew and believed, her taxable income for the calendar year 2001 was substantially in excess of \$51,119, and that upon said additional taxable income, a substantial additional tax was due and owing to the United States of America.

All in violation of Title 26, United States Code, Section 7201.

**Count 28**

- A. The allegations contained in Sections A through D of Count 1 are hereby realleged and incorporated herein as if fully set forth herein.
- B. For the calendar year 2002, in the Eastern District of Louisiana, the defendant, **BETTY JEFFERSON**, a resident of New Orleans, Louisiana, did willfully attempt to evade and defeat a large part of the income tax due and owing by her to the United States of America for the calendar year 2002, by concealing and attempting to conceal from the Internal Revenue Service the nature and extent of her income by intentionally not including on her personal tax return, the thousands of dollars she was stealing from the United States Department of Education and the State of Louisiana through the non-profit Grants, wherein it was stated that her taxable income

for the calendar year 2002 was the sum of \$57,708.00, and the amount of tax due and owing thereon was the sum of \$13,165.00, whereas, as she then and there well knew and believed, her taxable income for the calendar year 2002 was substantially in excess of \$57,708.00, and that upon said additional taxable income, a substantial additional tax was due and owing to the United States of America.

All in violation of Title 26, United States Code, Section 7201.

**Count 29**

A. The allegations contained in Sections A through D of Count 1 are hereby realleged and incorporated herein as if fully set forth herein.

B. For the calendar year 2003, in the Eastern District of Louisiana, the defendant, **BETTY JEFFERSON**, a resident of New Orleans, Louisiana, did willfully attempt to evade and defeat a large part of the income tax due and owing by her to the United States of America for the calendar year 2003, by concealing and attempting to conceal from the Internal Revenue Service the nature and extent of her income by intentionally not including on her personal tax return, the thousands of dollars she was obtaining from the United States Departments of Education and Housing and Urban Development through the non-profit Grants, wherein it was stated that her taxable income for the calendar year 2003 was the sum of \$54,198.00, and the amount of tax due and owing thereon was the sum of \$10,427.00, whereas, as she then and there well knew and believed, her taxable income for the calendar year 2003 was substantially in excess of \$54,198.00, and that upon said additional taxable income, a substantial additional tax was due and owing to the United States of America.

All in violation of Title 26, United States Code, Section 7201.

**Count 30**

A. The allegations contained in Sections A through D of Count 1 are hereby realleged and incorporated herein as if fully set forth herein.

B. For the calendar year 2004, in the Eastern District of Louisiana, the defendant, **BETTY JEFFERSON**, a resident of New Orleans, Louisiana, did willfully attempt to evade and defeat a large part of the income tax due and owing by her to the United States of America for the calendar year 2004, by concealing and attempting to conceal from the Internal Revenue Service the nature and extent of her income by intentionally not including on her personal tax return, the thousands of dollars she was obtaining from the United States Departments of Education and Housing and Urban Development through the non-profit Grants, wherein it was stated that her taxable income for the calendar year 2004 was the sum of \$53,534.00, and the amount of tax due and owing thereon was the sum of \$8,981.00, whereas, as she then and there well knew and believed, her taxable income for the calendar year 2004 was substantially in excess of \$53,534.00, and that upon said additional taxable income, a substantial additional tax was due and owing to the United States of America.

All in violation of Title 26, United States Code, Section 7201.

**Count 31**  
**(Conspiracy to Commit Money Laundering)**

**A. AT ALL TIMES MATERIAL HEREIN:**

1. The allegations of Sections A through D of Count 1 are realleged and incorporated as if fully set forth herein.
2. Specified unlawful activity includes mail fraud in violation of Title 18, United States Code, Section 1341 involving mailings in furtherance of the scheme set forth in Count 1, and federal program fraud in violation of Title 18 United States Code Section 666 as set forth in Counts 12 and 13.

**B. CONSPIRACY:**

Between a time unknown, but before January 1, 1998, and continuing until the present, in the Eastern District and elsewhere, **BETTY JEFFERSON, ANGELA COLEMAN and MOSE JEFFERSON**, and others, did, knowingly and intentionally combine, conspire, confederate and agree together and with each other, and with other persons known and unknown to the Grand Jury, to conduct financial transactions affecting interstate commerce in violation of Title 18, United States Code, Section 1956(a)(1)(A)(I) and (a)(1)(B)(I), which transactions involved the proceeds of specified unlawful activities, namely, that is mail fraud and program fraud as set forth in Counts 12 through 23, knowing that the transactions were designed in whole and in part to conceal and disguise the nature and source of the proceeds of said specified unlawful activity,

and with the intent to promote the carrying on of the said specified unlawful activity and, that while conducting and attempting to conduct such financial transactions, the defendants knew that the property involved in the below listed financial transactions represented the proceeds of some form of unlawful activity.

**C. OVERT ACTS**

1. On or about November 30, 1999, the defendants **MOSE JEFFERSON** and **BETTY JEFFERSON** caused Orleans Metro to transfer the title and ownership of 936 Jackson Avenue, New Orleans, Louisiana, located in the 4th Municipal District, to the defendant **BETTY JEFFERSON** for the purchase price of \$18,295. From on or about November 1999 through on or about March 15, 2002, the defendant **BETTY JEFFERSON** paid workers to repair and restore 936 Jackson Avenue with Care Unlimited grant funds.
2. On or about June 12, 2002, the defendant **MOSE JEFFERSON** caused Orleans Metro to transfer title and ownership of 3313 South Saratoga Street, New Orleans, Louisiana (3313 S. Saratoga) to Southwind for \$10,000. Prior to this date and continuing until September 2005, the defendant **MOSE JEFFERSON** paid workers to repair and restore 3313 S. Saratoga with Grant funds from Care Unlimited and Orleans Metro.
3. On or about December 21, 2005, the defendant **MOSE JEFFERSON** transferred the ownership of 3313 S. Saratoga from Southwind to B.E.P. for \$10,000, knowing that more than \$10,000 in Grant funds had been used to pay workers to repair and restore 3313 S. Saratoga.
4. On or about March 23, 2004, the defendant **BETTY JEFFERSON** mailed a check in the amount of \$965.24 from Jefferson Consultants to Chase Manhattan Mortgage Corporation (Chase Mortgage) to pay her monthly mortgage note for 1725 Valmont Street. The defendant **BETTY JEFFERSON** had deposited funds from Care Unlimited BO865 into Jefferson Consultants which were used to cover the check.
5. On or about August 15, 2004, the defendant **BETTY JEFFERSON** wrote check #1086 out of Care Unlimited BO865 payable to Family Member 1 for \$850 which defendant **BETTY JEFFERSON** mailed to Chase Mortgage for payment on her monthly mortgage note for 1725 Valmont Street.

6. On or about April 14, 2005, the defendant **ANGELA COLEMAN** deposited Bridge Program BO865 check #1129 in the amount of \$1,355 into A Plus checking account BO343, which check was made payable to Individual C. On the same day, April 14, 2005, she wrote check #1046 from A Plus to Standard Mortgage for \$1,368.99 to pay her mortgage note for 1723 Valmont Street.
7. On or about June 27, 2005, the defendant **BETTY JEFFERSON** converted Care Unlimited Bridge Program check #1145 made payable to Individual C for \$630 into a cashiers check which she mailed to pay her Chase credit card statement (ChaseCC7749).

All in violation of Title 18, United States Code, 1956(h).

## NOTICE OF MAIL FRAUD AND PROGRAM FRAUD FORFEITURE

1. The allegations of Counts 1 and 12 through 23 of this indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Sections 18, 371, 666, 1341 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461.

2. As a result of the offenses alleged in Counts 1 and 12 through 23, defendants, **BETTY JEFFERSON, ANGELA COLEMAN and MOSE JEFFERSON**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461, any and all property, real or personal, which constitutes or is derived from proceeds traceable to a violation of Title 18, United States Code, Sections 371, 666 and 1341.

3. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Sections 371, 666, 1341 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461.

### **NOTICE OF AGGRAVATED IDENTITY THEFT FORFEITURE**

1. The allegations of Counts 2 through 11 of this Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Sections 1028A and 982(a)(2)(B).

2. As a result of the offenses, alleged in Counts 2 through 11, the defendants, **BETTY JEFFERSON** and **ANGELA COLEMAN**, shall forfeit to the United States all property real or personal, constituting, or derived from, proceeds the defendants obtained directly or indirectly, as a result of aggravated identity fraud, in violation of Title 18, United States Code, Section 1028A.

3. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b)(1) and Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Section 982.

### **NOTICE OF MONEY LAUNDERING FORFEITURE**

1. The allegations of Count 31 of this Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Section 982.

2. As a result of the offense, alleged in Count 31, defendants **BETTY JEFFERSON, ANGELA COLEMAN** and **MOSE JEFFERSON**, shall forfeit to the United States all property real or personal, involved in the aforesaid offenses and all property traceable to such property which was involved in the said violations of Title 18, United States Code, Section 1956(h).

3. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;

- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b)(1) to seek forfeiture of any other property of said defendants.

All in violation of Title 18, United States Code, Section 982.

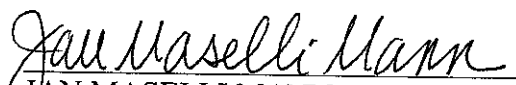
A TRUE BILL:



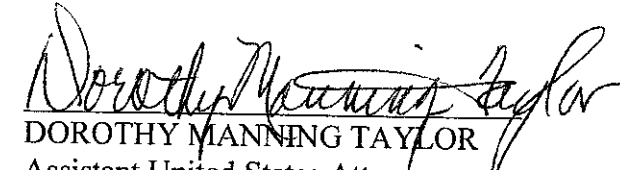
FOREPERSON



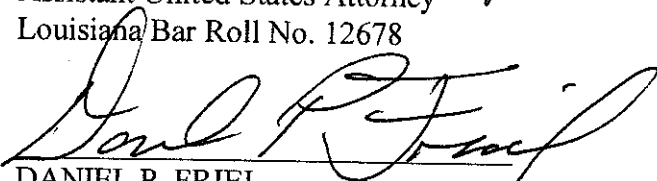
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New Orleans, Louisiana  
June 4, 2008